



California Fair Political Practices Commission

May 13, 1986

Michael E. Crantrall
California Public Defenders Association
717 K Street, Room 500
Sacramento, CA 95814

Re: Your Request for Advice
Our File No. A-86-138

Dear Mr. Crantrall:

This is in reply to your letter of April 23, 1986, regarding the lobbying provisions of the Political Reform Act.

You have asked if it is permissible for your organization to pay for legislative advocacy services via another organization that also contracts with the same legislative advocate, and if permissible, the proper method of reporting.

Your organization, as a lobbyist employer, may make payments to another organization for lobbying services. When reporting the payments on your employer report, Form 635, you must report your payments as if they were made directly to the lobbyist in Part III, B, Payments to Lobbying Firms, Including Individual Contract Lobbyists, with a notation that the payments to the lobbyist are being made through the other organization, i.e., California Attorneys for Criminal Justice.

You also asked how to report payments to a lobbyist who has provided office space to your lobbyist. You report this as an advance or other payment to your lobbyist in Part III B, Column (C) of your employer report.

I hope the above answers your questions. If you need further assistance or clarification, please do not hesitate to contact the Technical Assistance and Analysis Division.

Sincerely,

A handwritten signature in cursive script, reading "Mary Ann Kvasager", is positioned above the printed name.

Mary Ann Kvasager
Political Reform Consultant

MAK:cah



California Fair Political Practices Commission

April 28, 1986

Michael E. Cantrall
CPDA
717 K Street, Room 500
Sacramento, CA 95814

Re: 86-138

Dear Mr. Cantrall:

Your letter requesting advice under the Political Reform Act has been received by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact the Technical Assistance and Analysis Division at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or unless more information is needed to answer your request, you should expect a response within 21 working days.

Very truly yours,

A handwritten signature in cursive script that reads "Jeanne Pritchard".

Jeanne Pritchard
Chief

Technical Assistance and Analysis
Division

JP:plh



CPDA

California Public Defenders Association
717 K Street, Room 500
Sacramento, CA 95814
(916) 448-1383

CPDA: A Statewide Organization of Public Defenders and Defense Counsel
(Not a law firm or legal service)

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April 23, 1986

California Fair Political Practices
Commission
Attn: Technical Assistance Division
P.O. Box 807
Sacramento, CA 95804

Dear FPPC:

Our organization is planning to arrange to indirectly pay for our legislative advocacy services via another organization that also contracts with the same legislative advocate. We are wondering if this is permissible. What we would do is this: We receive representation by a lobbyist, he bills another organization for the services he renders for them, and also bills the other organization for the services he renders for our organization. Our organization then reimburses the other organization for the portion of the payment owed by us.

Another question that we have is this: How should we report on the quarterly forms, amounts paid to a lobbyist for expenses he is billing us for another lobbyist's expenses (our lobbyist is using another lobbyist's office space and we are reimbursing this third-party, who happens to be a lobbyist, for the use of the space).

Please feel free to call if you have questions, or need to ask for clarification on these arrangements.

Sincerely,

Michael E. Cantrall
Executive Director